

REMARKS

Reconsideration of the present application, as amended, is respectfully requested.

I. STATUS OF THE CLAIMS

Claims 1-24 are pending in this application. Claim 12 has been amended to further clarify that the insulating region is a sub-N-well embedded within said first P-well and has an N-type diffusion region that receives an off mode control voltage for preventing a latch-up current.

Support for the above amendments to claim 12 may be found throughout the specification as originally filed. No new matter has been added by virtue of this amendment.

II. Claim Rejections under 35 U.S.C. §102

(i) Claims 1-10, 12-17 and 19-24 have been rejected under 35 U.S.C. §102(e) as being anticipated by or, in the alternative, under 35 U.S.C. §103(a) as obvious over U.S. Patent No. 6,690,067 to Ker et al. ("the Ker patent").

In response, Applicants respectfully assert that Ker fails to teach or suggest all of the features of the presently claimed invention as recited in claims 1 and 12.

Ker at the very least fails to teach or suggest the insulating region recited in claims 1 and 12. On pages 2 and 5 of the Office Action, it is alleged that the middle N-well depicted in Fig. 3b of Ker is the same element as the insulating region recited in claims 1 and 12.

The Applicants respectfully disagree with the above characterization because the middle N-well depicted in Fig. 3b of Ker and the insulating region recited in claim 1 are clearly structurally distinct elements from one another. Rather, element 22 of Ker is an N-type well as opposed to an insulating region as recited in claims 1. Moreover, one skilled in the art would readily understand that an N-type well and insulating region of a semiconductor device are

clearly not the same element as one another, and thus Ker fails to teach or suggest an insulating region, as recited in claims 1 and 12.

Moreover, since the N-well element of Ker and the insulating region of claim 1 are not the same for the reasons discussed above, it must also follow that the devices and the results produced therefrom must also be different. Thus, claims 1 and 12 are not anticipated or rendered obvious by Ker.

It is also noted that in addition to the reasons set forth above, claim 12 is even further distinguishable from Ker because Ker at the very least also fails to teach or suggest a semiconductor device wherein an insulating region is a sub-N-well embedded within said first P-well and has an N-type diffusion region that receives an off mode control voltage for preventing a latch-up current, as recited in claim 12.

For the reasons set forth above, withdrawal of the above rejections to claims 1 and 12 is respectfully requested. As claims 6-10 depend from and incorporate all of the limitations of claim 1 and claims 13-17 depend from and incorporate all of the limitations of claim 12, withdrawal of the rejection to these dependent claims is likewise respectfully requested.

In addition, Ker also fails to teach or suggest all of the features of the presently claimed invention as recited in independent method claim 19, for essentially the same reasons as set forth above with regard to claims 1 and 12. In particular, Ker at the very least fails to teach or suggest a method of forming a semiconductor device, wherein an insulating region is formed inside a second well.

Therefore, withdrawal of the above rejections to claim 19 is respectfully requested. As claims 23-24 depend from and incorporate all of the limitations of claim 19, withdrawal of the rejection to these dependent claims is also respectfully requested.

(ii) Claims 1, 12 and 19 have been rejected under 35 U.S.C. §102(e) as being anticipated by or, in the alternative, under 35 U.S.C. §103(a) as obvious over U.S. Patent No. 6,847,059 B2 to Tsuji et al. ("the Tsuji patent").

In response, Applicants respectfully assert that Tsuji fails to teach or suggest all of the features of the presently claimed invention as recited in claim 1.

Tsuji at the very least fails to teach or suggest the insulating region recited in claim 1. On pages 9-11 of the Office Action, it is alleged that well region 22 depicted in Fig. 1 of Ker is the same element as the insulating region recited in claim 1.

Similar to reasons set forth above with regard to the Ker reference, element 22 described in Tsuji and mentioned on pages 9-11 of the Office Action is likewise clearly a structurally distinct element from the insulating region recited in claims 1, 12 and 19. Rather, element 22 of Tsuji is an N-type well as opposed to an insulating region as recited in claims 1, 12, 19. One skilled in the art would readily understand that an N-type well and insulating region of a semiconductor device are clearly not the same element as one another, and thus Tsuji fails to teach or suggest an insulating region, as recited in claims 1, 12 and 19.

Moreover, as with Ker, claim 12 is even further distinguishable from Tsuji because Tsuji likewise at the very least also fails to teach or suggest a semiconductor device wherein an insulating region is a sub-N-well embedded within said first P-well and has an N-type diffusion region that receives an off mode control voltage for preventing a latch-up current.

For the reasons set forth above, withdrawal of the above rejection to claims 1, 12 and 19 based upon Tsuji is respectfully requested.

III. 35 U.S.C. §103 REJECTIONS

Claims 11 and 18 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Ker .

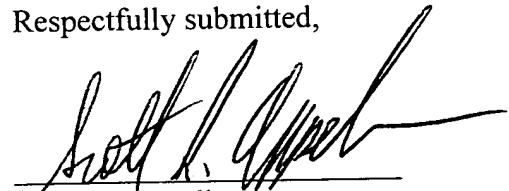
As mentioned above, Ker at the very least fails to teach or suggest the insulating region recited in claims 1 and 12. As claim 11 depends from and incorporates all of the limitations of claim 1 and claim 18 depends from and incorporates all of the limitations of claim 12, Ker likewise fails to teach or suggest all of the features recited in these dependent claims as well. Therefore, withdrawal of the rejection to claims 11 and 18 is respectfully requested.

IV. CONCLUSION

For the foregoing reasons, applicants respectfully submit that the instant application is in condition for allowance. Early notice to that end is earnestly solicited.

If a telephone conference would be of assistance in furthering prosecution of the subject application, applicants request that the undersigned be contacted at the number below.

Respectfully submitted,



Scott L. Appelbaum
Reg. No. 41,587
Attorney for Applicants

F. Chau & Associates, LLC
130 Woodbury Road
Woodbury, NY 11797
Tel: (516) 692-8888
Fax: (516) 692-8889